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6 Attorneys for Defendants
Uber Technologies, Inc. and Rasier, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 MATTHEW PHILLIBEN, individually and on) Case No. 3:14-cv-05615-JST
behalf of all others similarly situated; and)
12 BYRON McKNIGHT, individually and on) JOINT STIPULATION AND [PROPOSED]
behalf of all others similarly situated,) ORDER FOR TEMPORARY STAY
13 Plaintiffs,) PENDING MEDIATION
14 vs.) Judge: Hon. Jon S. Tigar
15 UBER TECHNOLOGIES, INC., a Delaware)
Corporation; and RASIER, LLC, a Delaware)
Limited Liability Company,)
16 Defendants.)

1 Plaintiffs Matthew Philliben and Byron McKnight (“Plaintiffs”) and Defendants Uber
2 Technologies, Inc. and Raiser, LLC (“Uber”) (collectively with Plaintiffs, the “Parties”),
3 respectfully move this Court to enter a stipulation staying the current litigation for 60 days due to
4 pending settlement negotiations between the Parties. In support of this stipulation, the Parties
5 state:

6 WHEREAS, in order to resolve this dispute, the Parties are engaging in settlement
7 negotiations and believe that a compromise can be reached;

8 WHEREAS, the Parties have scheduled a mediation session with the Hon. Carl J. West
9 (Ret.) for August 4, 2015;

10 WHEREAS, in order to facilitate the Parties’ settlement discussions, the Parties request
11 and stipulate to a 60 day stay of the case and all currently scheduled hearings and deadlines;

12 WHEREAS, the Parties jointly desire to avoid further expenditure of the Court’s resources
13 or their own resources on this litigation pending completion of the agreed-upon mediation;

14 WHEREAS, no Scheduling Order has been entered for the case;

15 WHEREAS, the hearing on Uber’s Motion to Stay Proceedings Pending Arbitration is
16 currently scheduled for July 2, 2015;

17 WHEREAS, a Case Management Conference is currently scheduled for July 22, 2015;

18 NOW, THEREFORE, IN CONSIDERATION OF THE FOREGOING, IT IS HEREBY
19 STIPULATED by and between the Parties that, subject to Court approval, all scheduled deadlines
20 and hearings be continued for 60 days pending mediation between the Parties; the currently
21 scheduled July 2, 2015 hearing on the Motion to Stay Proceedings Pending Arbitration be
22 continued until at least August 27, 2015; the currently scheduled July 22, 2015 Case Management
23 Conference be continued until at least September 16, 2015; and the parties will file a Joint
24 Statement regarding the status of the settlement following the mediation.

25 **IT IS SO STIPULATED.**

26

27

28

1 Dated: June 29, 2015

IRELL & MANELLA LLP

3 By: /s/ A. Matthew Ashley

4 A. Matthew Ashley
5 Attorneys for Defendant
6 Uber Technologies, Inc. and Rasier, LLC

7 Dated: June 29, 2015

8 ARIAS, OZZELLO & GIGNAC, LLP

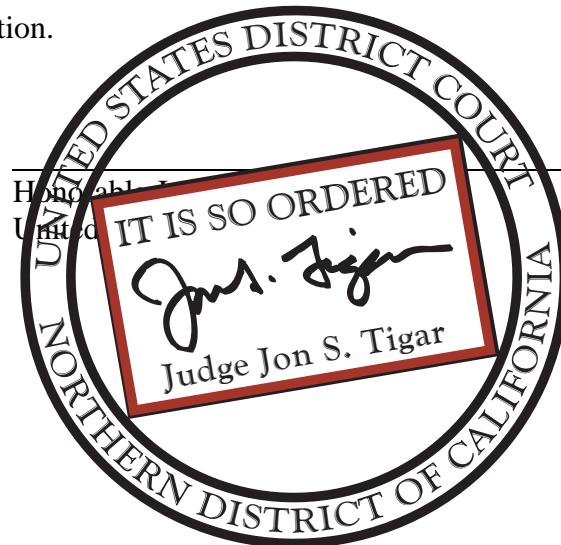
9 By: /s/ Mike Arias

10 Mike Arias
11 Alfredo Torrijos
12 Nicholas A. Coulson
13 Steven Liddle
14 Attorneys for Plaintiffs

1 PURSUANT TO STIPULATION, THE COURT ORDERS AS FOLLOWS:

2 All scheduled deadlines and hearings are continued for 60 days pending mediation between
 3 the Parties. The currently scheduled July 2, 2015 hearing on the Motion to Stay Proceedings
 4 Pending Arbitration is continued until August 27, 2015. The currently scheduled July 22, 2015
 5 Case Management Conference is continued until September 16, 2015, and the parties' deadline to
 6 file a Case Management Statement and act under Federal Rule of Civil Procedure 26, including the
 7 conference of the parties pursuant to Rule 26(f) and initial disclosures under Rule 26(a), are
 8 extended accordingly and discovery shall remain stayed. The parties will update the Court on the
 9 status of the settlement following the mediation.

10 Dated: June 29, 2015



ECF ATTESTATION

I, Nathaniel Lipanovich, am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER FOR TEMPORARY STAY PENDING MEDIATION. I hereby attest that I received authorization to insert the signatures indicated by a conformed signature (/s/) within this e-filed document.

By: /s/ Nathaniel Lipanovich

Nathaniel Lipanovich